



FEDERAL COMMUNICATIONS COMMISSION
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April 27, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Scott H. Kruize
4457 S. 158th Street
Tukwila, Washington 98188

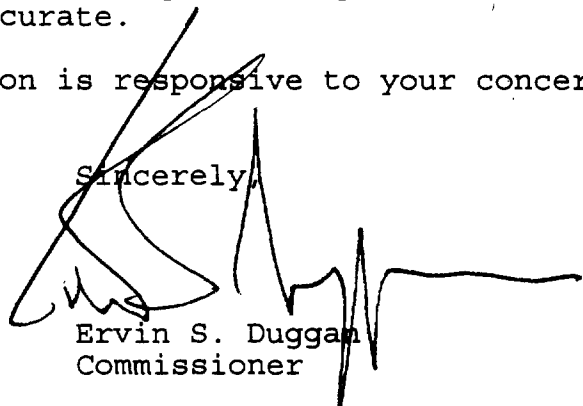
Dear Mr. Kruize:

Many thanks for your recent letter regarding the Commission's action in PR Docket No. 92-235, a Notice of Proposed Rulemaking which proposes to amend the Commission's rules governing the private land mobile radio services in the frequencies below 512 MHz.

Changes in technology and increased demand for spectrum have made it necessary for us to modernize our rules governing licensees in these frequencies. Our rulemaking is aimed at encouraging more efficient use of this spectrum, including frequencies in the 72-76 KHz band. While this band is now used primarily by industrial operators, it is also used on a secondary basis by remote control model airplane hobbyists. Because some of these secondary users have expressed concern about the impact of the rule changes on their hobby, the FCC's Private Radio Bureau has prepared a discussion sheet on this topic, a copy of which is enclosed. This document indicates that the proposed new rules present little risk of interference between operators of remote control model aircraft and industrial users. Of course, the FCC will carefully consider the public comments filed in this proceeding to be sure that our tentative conclusion is accurate.

I hope this information is responsive to your concerns.

Sincerely,


Ervin S. Duggan
Commissioner

Enclosure

Subject: Radio Control in the 72-76 MHz band

Question: What is the 72-76 MHz band used for?

Answer: The frequency range between 72-76 MHz is primarily a guard band between TV channels 4 and 5. Specifically, the channels between 72 and 76 MHz are licensed for use by 1) private and common carrier fixed station use at up to 300 watts output power (private and common carrier fixed use occurs on the same channels) and 2) private land mobile use at up to 1 watt output power. The channels between 72 and 76 MHz are also available for unlicensed secondary use by remote control operators of model aircraft, boats and cars at .75 watts output power.

Question: What is the relationship between fixed and mobile land mobile operations and radio control operations?

Answer: Radio control channels are located between fixed and mobile channels. The radio control channels overlap with the fixed and mobile channels. Radio control operations are unlicensed and are secondary to fixed and mobile operations. This means that radio control operations must accept interference from fixed and mobile users, and may not cause interference to such users.

Question: What changes are proposed in PR Docket 92-235 that have raised the concern of radio control operators?

Answer: We have proposed that over a 20 year period, 20 kHz mobile channels in the 72-76 MHz band be replaced with 5 kHz mobile channels. (See the attached page.) Apparently, radio control operators believe that this would make many of their frequencies unusable.

Question: Private land mobile, common carrier, and radio control users have peacefully shared spectrum in this band for many years. Would these changes lead to problems between various classes of users?

Answer: We can not categorically state that authorized mobile operations under the current or proposed rules could never harm radio control operations. However, in practice, all types of users can and do operate without conflict, although there are rare occurrences of interference between these users. We believe that under our proposed rules they should remain rare.

First, permitted power levels for both services are comparable. (For radio purposes, 3/4 of a watt is indistinguishable from 1 watt.) In approximate terms, this means that even if a factory and a radio control hobbyist shared a channel, which they would not under this proposal, the radio control user's model airplane would continue to stay under control as long as the plane is reasonably closer to the hobbyist's radio transmitter than the factory's radio transmitter. The fact that two users would not be using the exact same frequency significantly reduces risk of interference.

Second, radio control transmitter standards are stricter than they used to be. The proposed narrowband technical requirements are much stricter than current requirements. Thus, a 2.5 kHz frequency separation between land mobile and radio control users should be adequate given modern radio control equipment and the proposed land mobile equipment.

Third, land mobile operations authorized on the 72-76 MHz band are not car phones. Rather, these channels are used in limited locations such as a factory or construction site, mainly for non-voice operations to monitor or control expensive equipment such as overhead cranes. Model airplane enthusiasts seek clear areas and fields. Thus, the two classes of users rarely notice each other. The proposed technical standards would not change this important fact.

Question: Would the technical rules for the fixed users be changed?

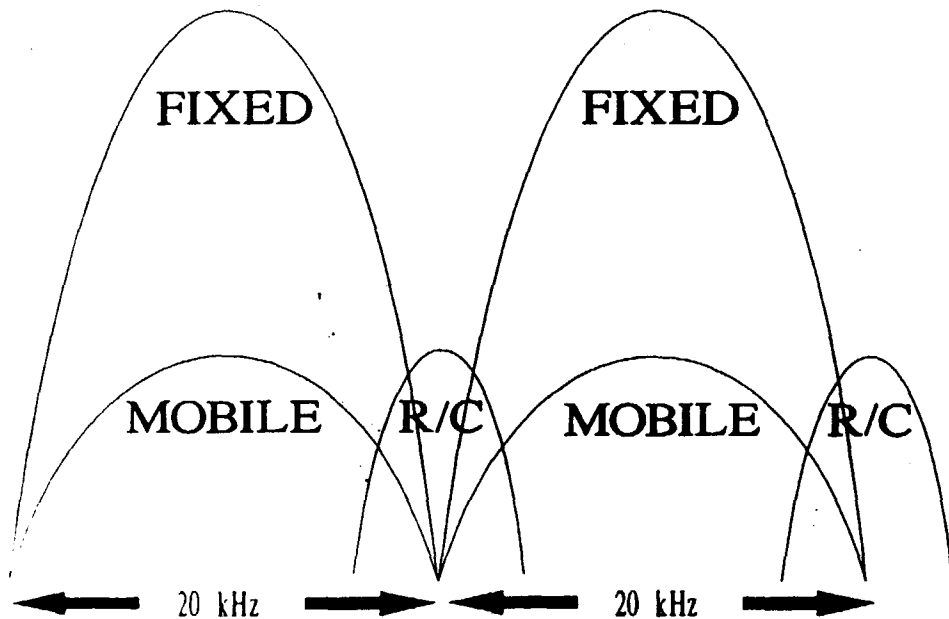
Answer: No. We are not proposing technical changes because such changes could have a significant adverse impact on other users, including mobile users and radio control operators.

Question: Would any changes be required of radio control users?

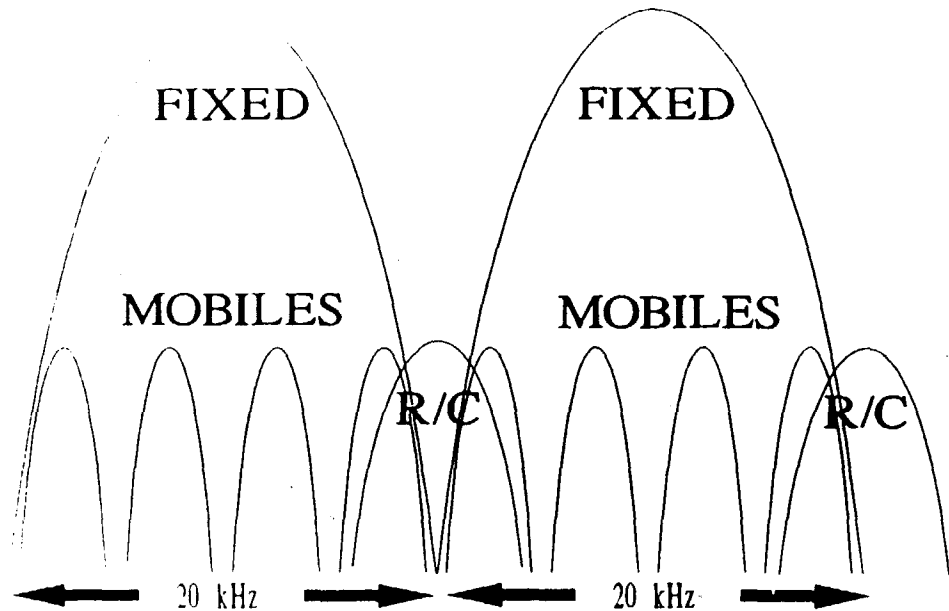
Answer: No. Current technical and operational requirements for radio control operations are compatible with the proposed changes for private land mobile radio use.

Finally, we recognize that our proposed rules are based on the information available at the time we wrote them. We seek constructive information in order to adopt final rules that meet our objectives of expanding capacity for private land mobile radio users with minimal or no harm to all existing users of the spectrum.

Channel Splits



Current channels
at 72-76 MHz



Proposed
channelization

92-235

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OFFICE OF THE SECRETARY

FCC Commissioner Ervin Duggan
1919 M St NW, Room 832
Washington, DC. 20554

Dear Mr. Duggan:

Feb. 17, 1993

I appeal to your sense of fair play. Interest groups in our country must give and take, accommodate each other, and compromise. One should not be allowed to run roughshod over another, simply because it's bigger and better financed.

Such an interest group--giant communications companies--want you to implement PR Docket 92-235. This action will effectively ruin my sport/hobby, radio control aircraft flying. 92-235 would cut the radio band into such tiny pieces, so close to the frequencies you've allotted us modelers, that we won't be able to fly our planes safely. Effectively, we won't be able to fly at all.

Mr. Duggan, we're not obstructionists. We know we're regarded as only "secondary" users of these frequencies, and are not trying to selfishly deny other users the right to these radio bands. We just ask not to be shut out entirely!

It was only two years ago that we had to go through major, disruptive changes! We didn't quibble then, when you cut up the radio band more narrowly, making obsolete and illegal the radios we'd used for years. I, myself, spent over \$300.00 upgrading or replacing perfectly good radio equipment, just to comply with the 1991 regulations.

Now, it's not just a matter of having to spend more money. It's beyond state-of-the-art radio technology for any R/C radios to be made to work in the narrow gaps left, if 92-235 goes through as written. We just couldn't fly so close to the powerful broadcasting stations used by the paging and cellular phone services.

As Commissioner, you have power and authority to give all legitimate users reasonable access to the radio band. We R/C modelers are law-abiding, taxpaying citizens, contributing to the economy through our professions and our legitimate sport/hobby. We have a right to our little niche. Please help us. Make the communications companies back off a bit, and make 92-235 less devastating.

Sincerely,

Scott H. Kruize

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